

United States District Court

DISTRICT OF NEW HAMPSHIRE

United States of America

v.

Ian Freeman

CASE NUMBER: 1:21-cr-000041

**DEFENDANT'S OBJECTION TO GOVERNMENT'S RULE 15(a) REQUEST
REGARDING MARY HURD**

NOW COMES the Defendant, Ian Freeman, by and through counsel, and objects to the Government's Motion To Rule 15(a) Deposition of Mary Hurd. As grounds, the Defendant states as follows:

1. The Defendant is charged with money laundering. Mr. Freeman denies that allegation. Furthermore, he asserts his right to face is his accuser and demands face to face confrontation of all witnesses the government utilizes in its prosecution
2. Mr. Freeman has never interacted with Mary Hurd to the best of his recollection.
3. The allegations set forth are not supported by an affidavit from Mary Hurd.
4. The allegations set forth are not supported by medical records or a qualified physician's opinion letter.
5. The Exhibit submitted displayed on Page 2 a valid Nevada driver's license and notes there are absolutely no restrictions relative to Ms. Hurd's Driving Privilege.
6. Any deposition held remotely would prejudice the Defendant as it would cheat the finder of fact by eliminating the jury's ability to judge the physical demeanor and behavior of the witness during the examination.

7. Apparently Bank of America, a reputable and highly regulated entity, did not see any problem with supplying large financial transfers on behalf of Mary Hurd. (See pages 5, 18, 20, 21, 24, 26).

WHEREFORE, The Defendant objects to the Government's request, demands his 6th amendment rights and requests an evidentiary hearing on the assertions made by the United State's Government.

Respectfully Submitted,

October 26, 2022

Date

/s/ Mark L Sisti

Signature

Mark L. Sisti

Print Name

387 Dover Road

Address

Chichester, NH 03258

City

State

Zip Code

(603) 224-4220

Phone Number

CERTIFICATION

I hereby certify that a copy of this objection was forwarded to Seth Aframe, Esq. and Georgiana MacDonald, Esq of the U.S. District Attorney's Office, electronically through EFC on October 26, 2022.

October 26, 2022

Date

/s/ Mark L Sisti

Signature

Mark L. Sisti

Print Name